

Patrick J. Reilly, Esq.  
Nevada Bar No. 6103  
Monique S. Jammer, Esq.  
Nevada Bar No. 15420  
BROWNSTEIN HYATT FARBER SCHRECK, LLP  
100 North City Parkway, Suite 1600  
Las Vegas, Nevada 89106  
Telephone: 702.382.2101  
Facsimile: 702.382.8135  
[preilly@bhfs.com](mailto:preilly@bhfs.com)  
[mjammer@bhfs.com](mailto:mjammer@bhfs.com)

*Attorneys for American Education Services, LLC*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

RICHARD KLEIN, RAYMOND URIAS, and  
SARA J. GUNTER, individually and on behalf  
of all others similarly situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE STUDENT  
LOAN TRUST 2005-3; NATIONAL  
COLLEGIATE STUDENT LOAN TRUST  
2006-3; NATIONAL COLLEGIATE  
STUDENT LOAN TRUST 2007-1;  
NATIONAL COLLEGIATE STUDENT  
LOAN TRUST 2007-2; NATIONAL  
COLLEGIATE STUDENT LOAN TRUST  
2007-3; NATIONAL COLLEGIATE  
STUDENT LOAN TRUST 2007-4;  
PENNSYLVANIA HIGH EDUCATION  
ASSISTANCE AGENCY d/b/a AMERICAN  
EDUCATION SERVICES; and  
TRANSWORLD SYSTEMS, INC.,

Defendants.

Case No. 2:22-cv-01392-GMN-BNW

**STIPULATION AND ORDER  
EXTENDING DEADLINE TO FILE  
REPLY MEMORANDUM IN SUPPORT  
OF AES' MOTION TO DISMISS**

**(First Request)**

///

///

///

///

25522999.1

**STIPULATION**

Plaintiffs Richard Klein, Raymond Urias, and Sara J. Gunter (“Plaintiffs”), and Defendant American Education Services, LLC (“AES”), by and through their undersigned counsel, hereby jointly stipulate, agree, and move as follows:

1. On March 13, 2023, AES filed and served their Motion to Dismiss Amended Complaint (the “Motion”). ECF No. 42.

2. On April 10, 2023, Plaintiffs served their opposition to the Motion. ECF No. 52.

3. Pursuant to LR 7-2, AES’s reply memorandum is due to be filed on April 17, 2023.

4. Counsel for AES traveled to Great Lakes, Illinois during the week of April 10, 2023, to attend his son’s graduation from U.S. Navy Recruit Training Command at Great Lakes Naval Base.

5. Additional time is therefore needed to prepare and file the reply memorandum in support of the Motion.

6. The Parties have agreed that AES shall have up to and including April 24, 2023, to file its reply memorandum in support of its Motion.

7. This is the first requested extension by AES for this filing, which will neither prejudice any party nor unreasonably delay the litigation.

**IT IS SO STIPULATED.****DATED** this 17th day of April, 2023.**DATED** this 17th day of April, 2023.

/s/ Patrick J. Reilly  
Patrick J. Reilly, Esq.  
Monique S. Jammer, Esq.  
BROWNSTEIN HYATT FARBER  
SCHRECK, LLP

/s/ Gerardo Avalos  
Scott C. Harris, Esq.  
George Haines, Esq.  
Gerardo Avalos, Esq.  
FREEDOM LAW FIRM

*Attorneys for American Education  
Services, LLC*

*Attorneys for Plaintiffs and the Class*

**ORDER**

Pursuant to the foregoing Joint Stipulated Motion, and with good cause and excusable neglect appearing, **IT IS HEREBY ORDERED** as follows:

AES shall have up to and including April 24, 2023 to file its to file its reply memorandum in support of its Motion to Dismiss Amended Complaint (ECF No. 42).

IT IS SO ORDERED.

  
UNITED STATES DISTRICT JUDGE

Dated: April 17, 2023

BROWNSTEIN HYATT FARBER SCHRECK, LLP  
Attorneys at Law  
100 North City Parkway, Suite 1600  
Las Vegas, NV 89106